

BEFORE THE ~~DOCKET FILE COPY ORIGINAL~~  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of  
  
Local Competition and Broadband Reporting

CC Docket No. 99-301

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**REPLY COMMENTS**  
of the  
**GENERAL SERVICES ADMINISTRATION**

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## **Summary**

GSA responds to comments by many parties on a proposal by the Common Carrier Bureau to obtain periodic reports on the status of competition for local telephone and advanced telecommunications services. GSA explains that contrary to assertions by several carriers the Commission should establish a mandatory data collection program encompassing all telecommunications services.

From GSA's perspective, comments submitted in response to the Notice demonstrate the need to obtain information from a wide variety of carriers, not only the largest LECs. To cover more mid-sized firms, GSA recommends either reducing the proposed reporting threshold of 50,000 lines or subscribers nationwide or establishing a lower threshold on a state-by-state basis. While the overall reporting threshold should be reduced, GSA recommends increasing the threshold for broadband services, because the proposed service-specific limit of 1,000 broadband users nationwide would entail reporting by some very small entities.

GSA also addresses issues concerning disaggregation and confidentiality. Many parties demonstrate the need for the Commission to have access to geographically disaggregated data. However, to protect competitively-sensitive information, GSA recommends that the Commission maintain some source data as proprietary, and publish only statistical summaries.

Finally, GSA addresses the issue of selecting a reporting cycle that balances information needs with collection costs. Although an annual cycle would be less costly, GSA urges the Commission to reject claims that this period would be adequate at the start. Instead, GSA urges the Commission to begin with a shorter cycle and shift to a longer cycle after a year or so. Alternatively, GSA suggests that the Commission adopt recommendations by several carriers that it employ multiple reporting cycles depending on carrier size.

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**REPLY COMMENTS  
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GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA") submits these Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") in response to the Commission's Notice of Proposed Rulemaking ("Notice") released on October 22, 1999. The Notice seeks comments and replies on the need to collect information on the status of competition for local telephone and advanced telecommunications services.

**I. INTRODUCTION**

The Telecommunications Act of 1996 ("Telecommunications Act") places obligations on regulators and carriers to foster competition, to ensure universal service, and to reduce regulatory surveillance when competition has been achieved.<sup>1</sup> Moreover, Section 706(b) of the Telecommunications Act requires the Commission to monitor the deployment of broadband services throughout the nation.<sup>2</sup> To achieve these goals, the Commission needs a substantial amount of information in addition to

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<sup>1</sup> Notice, para. 12, citing Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. §§ 151 *et seq.* ("Telecommunications Act").

<sup>2</sup> Notice, para. 7.

the financial data specifically required for regulation of the carriers under its jurisdiction.<sup>3</sup>

The Commission proposes to obtain comprehensive data on the deployment of all types of telecommunications services. As described in the Notice, the Commission tentatively concludes that it should obtain data on:

- the number of voice grade wireline and wireless channels;
- the number of voice grade lines served from switching centers of incumbent local exchange carriers ("LECs") where competitors have collocation arrangements;
- the number of high capacity and broadband facilities;
- line counts for various Internet-provided telephony services; and
- the number of voice-grade mobile telephony subscribers.<sup>4</sup>

The plan outlined in the Notice requires carriers to provide geographically disaggregated data for each of these groups of services.

In the past few years, the Commission has relied substantially on *ad hoc* and voluntary procedures for collection of data on local service competition and advanced services deployment. However, the Notice explains that these procedures have fallen short in producing data of uniform quality and reliability.<sup>5</sup> Consequently, the Notice presents the tentative conclusion that the Commission should adopt a carefully structured and mandatory data collection program.<sup>6</sup>

On December 3, 1999, GSA submitted Comments in response to the Notice. In its Comments, GSA explained that it is vital for the Commission to adopt reporting

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<sup>3</sup> *Id.*, paras. 8-11.

<sup>4</sup> *Id.*, paras. 50-72.

<sup>5</sup> *Id.*, para. 12.

<sup>6</sup> *Id.*

requirements that are sufficient to ensure the orderly development of competition, but not so extensive that they impair the development of the competition that they are designed to measure.

More than 20 other parties submitted comments in response to the Notice. These parties include:

- 8 incumbent LECs and organizations of these carriers;
- 16 competitive LECs, other carriers and carrier associations; and
- a state regulatory agency.

Nearly all of the parties submitting comments in response to the Notice concur with the need to establish some type of periodic data collection program. However, several commenters assert that the Commission should establish a program that is much more limited in scope than the activity described in the Notice. Moreover, commenters discuss issues such as protection of competitively-sensitive data, and the appropriate reporting cycle. In these Reply Comments, GSA responds to the positions advanced by these parties.

## **II. CONTRARY TO ASSERTIONS BY SEVERAL CARRIERS, THE COMMISSION SHOULD ESTABLISH A MANDATORY PROGRAM TO COLLECT DATA ON COMPETITION FOR ALL SERVICES.**

### **A. State-administered and voluntary programs will not produce the consistent data that the Commission needs.**

Carriers objecting to the establishment of the program outlined in the Notice assert that the Commission should rely on voluntary procedures and systems administered by state regulatory agencies instead of establishing a mandatory national reporting program. For example, Frontier asserts that there is "little indication that the Commission's current voluntary local competition reporting program is not

working.”<sup>7</sup> According to Frontier, larger incumbent LECs will be motivated to comply with voluntary reporting guidelines as they continue to seek relaxation of regulatory procedures.<sup>8</sup>

Similarly, Winstar asserts that the Commission now adequately tracks local telephone competition and the deployment of advanced telecommunications capability through voluntary data collection procedures.<sup>9</sup> Moreover, Winstar notes that the Notice does not indicate that any state agency has agreed to curtail or eliminate its own reporting requirements if the Commission adopts national rules.<sup>10</sup>

In its Comments, GSA explained that the Commission should not rely exclusively on state data collection activities or so-called generally available information.<sup>11</sup> The Commission has noted that reporting standards established by state regulatory agencies are not uniform, so that reliance on these sources would not provide consistent data.<sup>12</sup> Also, some of the data to be obtained by the Commission — including data on the deployment of advanced telecommunications services required by the Telecommunications Act — are not generally available from any public source.<sup>13</sup> Moreover, it is vital that data be collected on a consistent basis over a period of time to allow the Commission to capture trends in the development of competition. Information on trends is vital to identify appropriate changes in the regulatory framework as competition emerges.

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<sup>7</sup> Comments of Frontier Corp. (“Frontier”), p. 1.

<sup>8</sup> *Id.*

<sup>9</sup> Comments of Winstar Communications (“Winstar”), p. 1.

<sup>10</sup> *Id.*, p. 3.

<sup>11</sup> Comments of GSA, p. 4.

<sup>12</sup> *Id.*, citing Notice, para. 14.

<sup>13</sup> Comments of GSA, pp. 2-4, citing Notice, paras. 14 and 30.

Incumbent LECs as well as competitive LECs agree that ratepayers will benefit from a mandatory data collection program. For example, U S WEST supports a periodic program for collecting data on all industry sectors, including new entrant, local exchange and broadband competitors.<sup>14</sup> U S WEST explains that this information will enable the Commission to promote the regulatory forbearance set forth in Section 10 of the Telecommunications Act and eliminate unnecessary regulation as contemplated by Section 11 of the legislation.<sup>15</sup> Similarly, comments by NorthPoint Communications explain that formulation of policies concerning broadband services “will be enhanced by uniform, comprehensive, accurate, and up-to-date information that permits the Commission to assess the status of developments in the marketplace and the need for regulatory intervention.”<sup>16</sup>

The Association for Local Telecommunications Services (“ALTS”) also describes the need for a national program, as opposed to local or voluntary efforts, in obtaining the information that the Commission needs. ALTS states:

It is important for the Commission to collect from all carriers information that is based on the same definitions and assumptions so that reports are comparable across reporting companies and geographic areas.<sup>17</sup>

GSA concurs with the observations, and urges the Commission to adopt the comprehensive national reporting requirements described in the Notice.

**B. Data on broadband and wireless competition is required.**

Several parties assert that the Commission should establish a more limited reporting program because comprehensive data on wireless and broadband services

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<sup>14</sup> Comments of U S WEST Communications (“U S WEST”), p.1.

<sup>15</sup> *Id.*

<sup>16</sup> Comments of NorthPoint Communications, p. 2.

<sup>17</sup> Comments of ALTS, p. 1.



is not necessary. For example, Bell Atlantic Mobile acknowledges the Commission's interest in obtaining data to monitor the growth of wireline competition, but opposes extending reporting requirements to firms providing commercial mobile radio services ("CMRS") that do not also provide wireline local exchange services.<sup>18</sup>

In addition, Winstar questions the need for the Commission to impose mandatory data collection requirements on broadband service providers and competitive LECs.<sup>19</sup> Similarly, Prism Communication Services states that broadband carriers "should be out trying to enter the market and fulfill the promises of the Telecommunications Act, not filing reports with the Commission."<sup>20</sup>

GSA agrees that it is important to avoid procedures that place an unreasonable burden on new competitors. Indeed, GSA suggests increasing the reporting threshold for broadband providers as discussed in the following section of these Reply Comments. However, service offerings have proliferated, and competitive conditions differ considerably among different services in various geographical areas.<sup>21</sup> To shape the requirements for regulation, to plan for orderly deregulation, and to determine the need for a variety of pro-competitive tools at the Commission's disposal, it is important to have reliable and geographically targeted information on the extent of competition for all types of telecommunications services.

Up to this point, the Common Carrier Bureau's Industry Analysis Division has concentrated on obtaining data on wireline switched services. However, the Commission has recognized that this information is not sufficiently broad. For example, the Commission released a Notice of Inquiry in CC Docket No. 98-146

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<sup>18</sup> Comments of Bell Atlantic Mobile Services, pp. 1-2.

<sup>19</sup> Comments of Winstar, p. 1.

<sup>20</sup> Comments of Prism Communication Services, p. 3.

<sup>21</sup> Comments of GSA, p. 4.

inviting comments and replies on actions that the Commission should take to ensure deployment of advanced telecommunications capabilities.<sup>22</sup> Comments by many parties in response to that Notice described the need for data on the availability of local access facilities supporting high bandwidth transmission services, as well as data describing the availability of collocation options and Unbundled Network Elements ("UNEs").<sup>23</sup>

In comments submitted to the Commission during the past few years, GSA has explained that a wide variety of telecommunications services — including high capacity, broadband and Internet services — are vital to Federal agencies in performing their functions. In those comments, GSA described the role of comprehensive data on the development of competition in "traditional" voice and data services, advanced telecommunications services, and telecommunications services providing access to the Internet.<sup>24</sup>

Most commenting parties concur with GSA that data on broadband deployment is needed by the Commission. The American Cable Association states that the Commission must collect meaningful data regarding broadband deployment that accommodates differences among various communication technologies.<sup>25</sup> Because of these requirements, the Association generally supports the proposed initiative to collect data regarding broadband activities.<sup>26</sup>

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<sup>22</sup> *Id.*, p. 4, citing *In the Matter of Inquiry Concerning the Deployment of Advanced Telecommunications Capabilities to All Americans in a Reasonable and Timely Fashion*, CC Docket No. 98-146, Notice of Inquiry released August 7, 1998.

<sup>23</sup> *Id.*, pp. 4-5.

<sup>24</sup> *In the Matter of Usage of the Public Switched Network by Information Service and Internet Providers*, CC Docket No. 96-263, Comments of GSA and the U. S. Department of Defense, March 24, 1997; and Reply Comments of GSA and the U. S. Department of Defense, April 23, 1997.

<sup>25</sup> Comments of American Cable Association, p. 3.

<sup>26</sup> *Id.*, p. 5.

Furthermore, ALTS recommends that the Commission adopt the broadband reporting requirements described in the Notice.<sup>27</sup> While cautioning against increasing the demands on competitors by expanding reporting requirements too widely, ALTS explains that for most carriers the obligations set forth in the Notice will not be burdensome.<sup>28</sup>

### **III. COMMENTS DEMONSTRATE THAT REPORTING THRESHOLDS SHOULD BE ADJUSTED.**

#### **A. Thresholds should be set to provide data for a slightly larger group of carriers.**

The Commission proposes that LECs with 50,000 or more local access lines or channels of any capacity nationwide, or 50,000 or more subscribers nationwide would be required to submit reports.<sup>29</sup> These requirements would encompass incumbent LECs, as well as their wireline and fixed wireless competitors.<sup>30</sup> Moreover, any entity with 1,000 broadband service lines or broadband subscribers would be required to participate.<sup>31</sup> Indeed, LECs with fewer than 50,000 access lines but more than 1,000 broadband service lines would be required to submit reports and complete portions of the report relevant to their activities, including sections addressing local, non-broadband services.

Carriers contest the 50,000 overall line and subscriber threshold, as well as the 1,000 line or subscriber threshold for broadband services. Most parties objecting to the 50,000 total line or subscriber threshold contest the fact that it is applied on a

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<sup>27</sup> Comments of ALTS, pp. 10-11.

<sup>28</sup> *Id.*, p. 11.

<sup>29</sup> Notice, para. 24.

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

nationally aggregated basis. For example, the National Rural Telecom Association (“NRTA”) complains that the 50,000 line benchmark would apply on a “nationwide holding company” basis, combining the lines or channels provided by all affiliated carriers, even if each of the carriers served geographically small, sparsely-populated rural areas scattered across the nation.<sup>32</sup>

GSA urges the Commission not to heed requests to increase the overall line or subscriber threshold. Holding companies with tens of thousands of lines nationwide should have adequate resources to participate in the program. As it stands, the proposed plan will only obtain information from about 35 incumbent LECs and 15 competitors.<sup>33</sup> In total, there are more 1,300 incumbent LECs and 200 facilities-based competitive LECs and resellers.<sup>34</sup> Thus, the overall reporting requirements will only affect a small fraction of carriers and exclude mid-sized and smaller firms.

To obtain a complete and unbiased picture of the status of competition, it is important not to confine data collection requirements to the largest LECs. Indeed, BellSouth points out that a 10,000 line requirement would be a natural break-point between mid-sized and small carriers in its serving area.<sup>35</sup> On this basis, BellSouth urges the Commission to recognize that a 10,000 line threshold would capture the data necessary to portray the state of competition in the local telecommunications markets more realistically.<sup>36</sup>

The State of Tennessee Consumer Advocate (“Tennessee CA”) also addresses the need to obtain data for mid-sized carriers. In its comments, the Tennessee CA

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<sup>32</sup> Comments of NRTA, p. 3.

<sup>33</sup> Notice, para. 37, n. 53.

<sup>34</sup> *Id.*

<sup>35</sup> Comments of BellSouth, p. 3.

<sup>36</sup> *Id.*

recommends that the aggregate 50,000 nationwide threshold be reduced to ensure that data is obtained for competitors with a more regionalized focus.<sup>37</sup>

Based on the comments by these parties, GSA recommends that the Commission consider reducing the 50,000 nationwide line or subscriber limit in order to provide a broader representation of mid-sized firms. Alternatively, GSA suggests that the Commission adopt a recommendation by U S WEST to employ a reporting threshold of 10,000 lines per state in place of the 50,000 line aggregate nationwide limit as a means of obtaining more data about competition in rural states.<sup>38</sup> GSA supports these recommendations because they should produce more valuable information on the status of competition throughout the entire nation.

**B. Service-specific limits for broadband services should be increased to eliminate reporting obligations for small local firms.**

Many parties comment negatively on the service-specific threshold of 1,000 lines or subscribers for broadband offerings. For example, the Competitive Telecommunications Association ("CompTel") states that this reporting requirement would impose a substantial administrative burden on many small entities.<sup>39</sup> Moreover, CompTel observes that a substantial part of this reporting burden would fall on Internet service providers whom the Commission has publicly disclaimed an interest in regulating.<sup>40</sup>

Comments asking the Commission to increase the broadband reporting threshold also focus on the burdens placed on smaller "conventional" wireline LECs that have been able to develop a substantial customer base for advanced services.

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<sup>37</sup> Tennessee CA, p. 6.

<sup>38</sup> Comments of U S WEST, p. 3.

<sup>39</sup> Comments of CompTel, p. 7.

<sup>40</sup> *Id.*

For example, the Organization for the Promotion and Advancement of Small Telephone Companies ("OPASTCO") notes that some rural carriers with only a few thousand lines overall may have reasonable expectations of achieving 1,000 broadband subscribers in the future.<sup>41</sup> OPASTCO explains that the procedures described in the Notice would place the same requirements on the small carriers as on much larger firms.<sup>42</sup>

ALTS makes a similar point on the requirements placed on small carriers with a disproportionately large number of broadband users.<sup>43</sup> GSA agrees with OPASTCO and ALTS that the requirement for all entities that provide broadband service to as few as 1,000 subscribers nationwide may require reporting from very small entities. Consequently, GSA concurs with the recommendation by ALTS that the Commission consider changing the threshold to 2,000 (or even possibly 5,000) broadband access facilities or subscribers throughout the nation.<sup>44</sup>

As an alternative to increasing the reporting threshold, the National Telephone Cooperative Association ("NTCA") suggests that the Commission consider a "short form" for small and rural carriers that reach the 1,000 line threshold for broadband services.<sup>45</sup> NTCA recommends that the Commission prepare a form that is one or two pages in length and can be completed in a few hours time.<sup>46</sup> The form would be

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41 Comments of OPASTCO, p. 3-4.

42 *Id.*

43 Comments of ALTS, p. 5.

44 *Id.*

45 Comments of NTCA, p. 4.

46 *Id.*

designed to meet current requirements, but it could be modified in the future to reflect changes in the industry.<sup>47</sup>

The plan proposed by NTCA is a practical compromise. GSA urges the Commission to consider this alternative as a means to balance the requirements for information on broadband services with the need to avoid disproportionate demands on the resources of smaller organizations.

**IV. PARTIES SHOW THAT GEOGRAPHICALLY DISAGGREGATED DATA IS VITAL, BUT MARKET-SENSITIVE INFORMATION MUST BE PROTECTED.**

**A. Geographically aggregated data will not adequately portray the status of competition.**

Several parties contend that the Commission should not require carriers to submit data for geographical areas that are smaller than states. For example, ALTS asserts that state boundaries are the appropriate regions for reporting because carriers maintain information on a state-by-state basis for a variety of tax, regulatory and other purposes.<sup>48</sup> Moreover, collection of information on this basis would reduce duplication between the activities of the Commission and those of state regulatory agencies.<sup>49</sup>

AT&T Corp. ("AT&T") also asserts that broadband data should only be reported on a state-by-state basis.<sup>50</sup> Acknowledging that it has recommended collecting LATA-specific data in other contexts, AT&T maintains that in this instance statewide data is sufficient to provide the Commission with the information it needs to fulfill its

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<sup>47</sup> *Id.*

<sup>48</sup> Comments of ALTS, pp. 6-7.

<sup>49</sup> *Id.*, p. 7.

<sup>50</sup> Comments of AT&T, p. 12.

statutory mandate and to determine the appropriate level of regulatory oversight of various carriers.<sup>51</sup>

On the basis of comments submitted in response to the Notice, GSA supports a more granular reporting program. Several parties argue convincingly that competitive conditions vary too widely within most states for statewide reporting to have much value. Thus, GSA urges the Commission to adopt smaller reporting areas subject to confidentiality protections described subsequently herein.

The Tennessee CA also submitted comments on the issue of requiring data for geographic areas smaller than a state. In its comments, the Tennessee CA explains that there are a “significant number of consumers in rural and low-income areas of the state who are at risk with regard to the development of local competition and the deployment of broadband services.”<sup>52</sup> Thus, Tennessee explains, it is vital to collect geographically disaggregated information according to nationally standardized reporting procedures that will allow Federal and state regulators to assess the status of competition in various regions.<sup>53</sup>

In its comments supporting data collection, U S WEST notes that it is vital to capture information on competition in rural areas.<sup>54</sup> To help meet this objective, U S WEST recommends that data be reported for metropolitan statistical areas (“MSAs”) and regions that are not part of an MSA in each state.<sup>55</sup> U S WEST notes that this procedure would not be as cumbersome as obtaining the data by wire center or zip

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51 *Id.*

52 Comments of Tennessee CA, p. 3.

53 *Id.*, pp. 3-4.

54 Comments of U S WEST, p. 3.

55 *Id.*, pp. 3-4.



code, yet allow the Commission to compare the levels of local competition in urban versus rural areas.<sup>56</sup>

For states with major metropolitan areas accounting for a significant part of the state's population, statewide aggregate reports would reflect competitive conditions in the urban areas alone and provide virtually no information about competition in the balance of the state. Thus, GSA concurs with U S WEST's proposal to separate data between MSAs and other areas.

**B. The Commission should maintain some reported data as confidential, and publish statistical summaries.**

Nearly all parties, including ardent advocates of a comprehensive data collection program, address the need to protect competitive-sensitive information. For example, US WEST supports the tentative conclusion that the Commission must obtain data from incumbent and competitive carriers, regardless of whether they employ wireline or wireless technologies to provide local service.<sup>57</sup> However, U S WEST explains that responses must be treated as confidential because the information encompassed in the survey is not generally available among competing companies.<sup>58</sup>

AT&T states that it "cannot emphasize strongly enough" that the information the Commission seeks is extremely sensitive.<sup>59</sup> AT&T continues that the information to be acquired would reveal where a carrier's customers are located, how many there are, and even a carrier's technical capabilities and cost structures.<sup>60</sup> Consequently, AT&T

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<sup>56</sup> *Id.*, p. 4.

<sup>57</sup> Comments of U S WEST, p. 4.

<sup>58</sup> *Id.*

<sup>59</sup> Comments of AT&T, p. 17.

<sup>60</sup> *Id.*, pp. 17-18 and n. 32.

urges the Commission to release only extremely aggregated data on a state-by-state basis.<sup>61</sup> Indeed, AT&T prefers that the Commission release no data whatsoever if there are only two or three firms in the particular industry segment (such as broadband services) in the geographical area.<sup>62</sup>

GSA is sensitive to the need to protect information that would impede the development of competition, but AT&T's proposed restrictions go a little too far and could impair the legitimate aims of the program. For example, a proposed restriction that even aggregate line counts not be released unless there are four or more competitors could eliminate reporting for many parts of the nation. Moreover, as Teligent observes, the Commission is not asking carriers for information about investments, rates, revenues, earnings, traffic volumes, or other operational matters.<sup>63</sup>

GSA recommends that the Commission adopt the procedures recommended by ALTS. According to ALTS' procedures, the Commission would obtain disaggregated information, but publicly release data without carrier identification at the state level regardless of the number of competitors. Thus, for example, the Commission would obtain detailed data, but only disclose the fact that two competitive LECs are operating in a state and currently provide service over a total of 4,000 local exchange lines.

**V. THE COMMISSION SHOULD NOT HEED ARGUMENTS THAT AN ANNUAL REPORTING CYCLE IS ADEQUATE AT THE BEGINNING OF THE PROGRAM.**

The Commission seeks comments on whether quarterly, semi-annual, or annual reporting would best serve the goals of the data collection program.<sup>64</sup> In listing

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<sup>61</sup> *Id.*, pp. 19-20.

<sup>62</sup> *Id.*

<sup>63</sup> Comments of Teligent, p. 5.

<sup>64</sup> Notice, para. 34.

these alternatives, the Notice states that the Commission's experience with voluntary surveys indicates that annual or semi-annual reporting will probably not be adequate to track the development of local competition in a timely way.<sup>65</sup>

Several carriers endorse annual reporting. For example, GTE states that annual reporting would be "more than adequate" to allow the Commission to track competition.<sup>66</sup> This carrier claims that "quadrupling the reporting burden on carriers" is unlikely to provide the Commission with appreciably better information.<sup>67</sup>

Similarly, AT&T urges the Commission to adopt an annual reporting cycle. According to AT&T, an annual cycle would enable the Commission to comply with the requirements of the Telecommunications Act, and at the same time not place a burden on the resources of competitive market participants.<sup>68</sup>

GSA acknowledges that there is a difficult choice between quarterly or semi-annual reporting, which would provide more current information, and annual reporting, which would be less costly.<sup>69</sup> On balance, however, GSA believes that annual reporting is not adequate to begin the program.

Indeed, many carriers urge the Commission not to adopt an annual reporting cycle. For example, NorthPoint Communications states, "Annual reporting is not sufficient to monitor this rapidly changing marketplace."<sup>70</sup>

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<sup>65</sup> *Id.*

<sup>66</sup> Comments of GTE, p. 10.

<sup>67</sup> *Id.*

<sup>68</sup> Comments of AT&T, p. 14.

<sup>69</sup> Comments of GSA, p. 7.

<sup>70</sup> Comments of NorthPoint Communications, p. 7.

In the same vein, BellSouth states that reports on an annual or semi-annual basis are too infrequent for tracking the development of competition.<sup>71</sup> Because of the swift and steady pace of market developments, BellSouth recommends that reports be filed quarterly.<sup>72</sup> BellSouth explains that a quarterly cycle will not overburden carriers or the Commission staff, but nevertheless give the Commission the information it needs on a timely basis.<sup>73</sup>

In its Comments, GSA suggested that the Commission start with a shorter period — quarterly or semi-annually — and then shift to an annual cycle after a few years.<sup>74</sup> GSA explained that this procedure would provide more data at the outset when it is needed most, and give an early indication of trends and growth rates, but still reduce data collection requirements in the longer run.<sup>75</sup>

Several parties proposed plans with different reporting cycles depending on carrier size. For example, in the plan proposed by NTCA, the “short form” for smaller carriers would be filed annually, although larger carriers would be required to submit more frequent reports.<sup>76</sup> GSA would support this recommendation with the addition of the requirement that even small carriers start the program with at least two quarterly or semi-annual reports to establish initial conditions and trends.

Similarly, the Tennessee CA suggests that small companies might be required to submit reports every two years, but larger firms would file semi-annual reports.<sup>77</sup>

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<sup>71</sup> Comments of BellSouth, p. 4.

<sup>72</sup> *Id.*

<sup>73</sup> *Id.*

<sup>74</sup> Comments of GSA, p. 7.

<sup>75</sup> *Id.*

<sup>76</sup> Comments of NTCA, p. 4.

<sup>77</sup> Comments of Tennessee CA, p. 8.

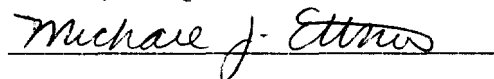
GSA would also concur with this plan, again with the condition that even small carriers start the program with at least two quarterly or semi-annual reports.

## **VI. CONCLUSION**

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations set forth in these Reply Comments.

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December 20, 1999

## CERTIFICATE OF SERVICE

I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration" were served this 20th day of December, 1999, by hand delivery or postage paid to the following parties.

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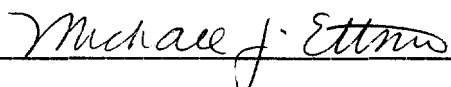
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